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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

RAFAEL TORRES,

Plaintiff,

vs.

UNION PACIFIC RAILROAD COMPANY
and DOES 1 through 50, inclusive,

Defendants.

Case No. CIV.S-04-2670 FCD GGH

**STIPULATION ALLOWING
SUPPLEMENTAL DISCLOSURE OF
EXPERT INFORMATION**

TRIAL DATE: March 28, 2006

IT IS HEREBY STIPULATED by and between all parties to this action, and their attorneys of record, as follows:

1. The parties hereby stipulate to permit each party to provide supplemental disclosure of expert information required by FRCP Rule 26(2) after the initial disclosure date set by the Court, at appropriate intervals, and no later than the pre-trial disclosure date set by the court or by FRCP Rule 26(3).

2. This Stipulation is entered into in light of the fact that the Court has set the initial date for disclosure of experts prior to the cut off of discovery and eight months prior to the date currently set for the trial of this matter. The parties agree the probability of additional evidence being obtained between the initial disclosure date and the trial date is high and the parties should have the right to supplement their disclosure and designation in the event that additional evidence warrants such change.

Dated: July 19, 2005. **GANONG & WYATT, LLP**

Dated: July 19, 2005. **UNION PACIFIC RAILROAD COMPANY**

ORDER

Dated: July 26, 2005 .

/s/ Frank C. Damrell Jr.
United States District Judge